Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Technology Transitions Policy Task Force	)	GN Docket No. 13-5

COMMENTS OF INTRADO INC.

Intrado Inc. ("Intrado") hereby submits these initial Comments on the Technology Transitions Policy Task Force's *Public Notice* regarding potential real-world trials to explore technology transition issues.[1] Intrado has been a leading driver in the nation's transition to Next Generation 911 (NG911) and has experienced firsthand the myriad of issues facing public safety and providers that are part of that endeavor. The Federal Communication Commission's (FCC or Commission) effort to accelerate the transition is appropriate, and Intrado supports one or more real-world data-rich trials focused specifically on NG911.

Founded in 1979, Intrado developed much of America's emergency communications technology and has supported the delivery of emergency services for more than thirty-two years. Essentially, Intrado provides the core of the nation's 911 infrastructure by managing the majority of the nation's caller location and selective routing information and by delivering or supporting the delivery of several hundred million 911 calls every year.

Intrado pioneered location and routing solutions for wireline, wireless and voice over internet protocol ("VoIP") 911 calls and for SMS text messaging to 911. Intrado, in conjunction

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1 *Technology Transitions Policy Task Force Seeks Comment on Potential Trials*, Public Notice, DA 13-1016, GN Docket No. 13-5 (rel. May 10, 2013) ("Public Notice").

with its affiliate, Intrado Communications Inc., led the development of NG911 products and services—with early deployments in Washington, Vermont and Florida. Today, Intrado provides NG911 services—either directly or through a partner—in 13 states.

As a competitive provider of 911 services, Intrado replaces the legacy selective router and TDM trunks to PSAPs with soft switches and secure IP backbone between the Intrado network and the PSAP(s). These deployments enable PSAPs to receive traditional TDM calls as well as calls in IP format, data, video and text messages. The IP networks and advanced call handling equipment of Intrado's NG911 deployments enable new features and capabilities. For example, PSAPs are able to access and utilize significant "situational" data, such as premise information, medical records, and records that identify persons or places of interest with respect to a particular 911 call.

Trials to explore and document NG911 issues will highlight issues that impact deployment and place them in context. Through its early deployments of NG911, Intrado has begun to identify technical, regulatory and operational issues associated with the NG911 architecture. The use of a collaborative process and focused trial will help to identify solutions to many of the issues that have arisen and will likely continue to impact future deployments. Although ensuring the continued availability of 911 capabilities is an essential element of the wireline and wireless trials also discussed in the *Public Notice*, such trials would not provide the real-time record that an NG911-focused trial would provide. Therefore, regardless of what trial(s), if any, the Task Force develops for wireline or wireless technology transitions, there is merit in conducting a separate trial or trials of NG911 deployments.

Intrado supports the selection of greenfield locations and greenfield capabilities in the design of a trial. By "greenfield" deployments in this instance, Intrado means the

introduction of new NG911 services or capabilities to replace legacy 911 services. This can include the deployment of NG911 where no next-gen capabilities are deployed today, such as the construction of and movement of traffic to an ESInet. It also can include observation of the transition of new services or capabilities over existing NG911 infrastructure such as the delivery calls with i3 location capability. Ideally, the Commission would work with a PSAP (or group of PSAPs) and involve all affected parties, including the legacy 911 provider, the NG911 provider(s) and all carriers that will be routing calls (including non-traditional call types) to the PSAP.

The benefits of a greenfield trial are in both the process of implementation and in the collection of real-time information. A greenfield trial will enable interested parties to contemporaneously observe the operational requirements of the deployment and consider in a collaborative manner the appropriate industry responses that are necessary to transition from a legacy 911 architecture to NG911 services. Improved understanding and memorialization of the technical, regulatory and operational practices most conducive to NG911 deployments can facilitate change, if necessary, of such practices. Moreover, a greenfield trial will enable local, state and federal government officials to collaborate, even where there is uncertainty as to the scope of jurisdictional authority over NG911 services. Such a trial can lead to clarity over the allocation of jurisdiction among the federal, state and local stakeholders.

To assist the Task Force in developing a trial, Intrado provides these additional comments organized as outlined in the *Public Notice*.

Scope. As stated above, Intrado supports the implementation of a real-world trial to study NG911 issues. Intrado agrees that the trial should be designed to illuminate all issues that arise in an NG911 deployment, including technical issues, regulatory obligations and operational

requirements. To that end, the Commission should not limit trials to only those that would deploy "all IP NG911 services." As this Commission has noted, the full end-state i3 environment is in the future,[2] even though the transition is and should be occurring today. Included in the scope of the Commission's view should be issues that impact the transition, which includes moving TDM calls from one network to another.

With respect to technical issues, Intrado recommends that the trial study how i3[3] concepts, such as the incorporation of Location Information Servers (LIS) to provide call location and the operation and interoperability of i3 location validation and routing mechanisms. In its *Public Notice,* the Commission assumes that "trial participants would…make location available through NG911 mechanisms, including the Location Information Server."[4] However, such capabilities have not been fully implemented, and evaluation of this capability would be valuable. Equally important are the examination of regulatory obligations associated with NG911 services, including those associated with delivery of TDM calls. The trial should examine the rules that govern interconnection for the purpose of delivering NG911 calls to PSAPs, including how sections 201 and 251 of the Communications Act apply to such interconnection. The trial should also examine the definition of a 911 service provider in an NG911 environment. In particular, what are the obligations of each entity involved in the handling of a call when multiple carriers are involved in call routing? Similarly, what are the obligations of each entity when disparate elements of NG911 service, such as location

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2 *Legal and Regulatory Framework for Next Generation 911 Services,* Report to Congress, Federal Communications Commission, Feb. 22, 2013, at 10 (transition to NG9-1-1 is "still in the early stages and there are no fully enabled NG911 systems yet operating").

3 The i3 standard was developed by the National Emergency Number Assocation ("NENA") to provide a comprehensive architecture for NG911 deployments. *See* NENA, Detailed Functional and Interface Standards for the NENA i3 Solution, 08-003v1, July 14, 2011 (available at http://www.nena.org/?page=i3_Stage3).

4 *Public Notice,* at 7.

information, mapping or medical information, are provided by different entities? Further, when localities, states or regions operate the ESINet and multiple entities deliver calls directly to the ESINet, which entities are considered 911 service providers? Finally, consideration should be given to NG911 network and service reliability. The Commission is currently investigating the reliability and resiliency of 911 networks. Through the proposed NG911 trials, the Commission and the industry will be better able to examine the differences between the operation of legacy 911 networks and NG911 networks and determine if various existing Best Practices and/or requirements are universally applicable to both.

Process. Intrado recommends that the Task Force establish a window for the receipt of proposals by PSAPs and localities to participate in NG911 trials. The window should be established after the Task Force provides additional details concerning the intended scope of any NG911 trial. This will allow PSAPs to plan adequately for participation in a trial. Preliminarily, Intrado has had discussions with PSAPs, including the Texas 911 Alliance and the Minnesota Metropolitan Emergency Services Board (MESB), that have shown interest in participating in a trial and will be pursuing opportunities with those entities. Once there is more certainty regarding the scope of a trial, Intrado expects additional PSAPs and carriers to be interested in participation.

Once candidate locations are identified for a trial, the planning and implementation of a NG911 deployment should be conducted through workshops that are open to all affected participants. The workshops should be supervised by FCC and state/local personnel in order to facilitate discussion and consensus on implementation issues.

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July 8, 2013